

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff,

vs.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS,
INC. d/b/a FIRST SPINE REHAB, FUTURE
MANAGEMENT CORPORATION,
EDWARD KENNEDY, BRIAN J. CULLINEY
and JENNIFER McCONNELL

Defendants.

CIVIL ACTION NO.: 05-11693RCL

**Defendants Joseph D. Giampa, Frederick T. Giampa, Advanced
Spine Centers, Inc. and Future Management Corp.'s Motion to Enlarge Time to
Oppose Motion to Compel Answers to Interrogatories**

Now Come the Defendants Joseph D. Giampa, Frederick T. Giampa, Advanced Spine centers Inc and Future Management Corp. and respectfully request the Court enlarge their time for opposing the Plaintiff's Motion to Compel Answers to Interrogatories.

This Motion is supported by the attached Memorandum of law in Support of Motion to Enlarge Time to Oppose Plaintiff's Motion to Compel Answers to Interrogatories.

Respectfully submitted,
The Moving Defendants
By counsel,

/s/ Matthew J. Conroy
Matthew J. Conroy (BBO# 566928)
BELESI & CONROY, P.C.
1225 Franklin Avenue – Suite 400
Garden City, NY 11530
(516) 248-2929

CERTIFICATE OF SERVICE

I, Matthew J. Conroy do hereby certify that a true and accurate copy of the foregoing pleading was served upon all counsel of record by ECF and by mailing the same US Mail 1st Class postage prepaid this 9th day of July 2007.

/s/ Matthew J. Conroy

Matthew J. Conroy

Dated July 09, 2007